

## **Exhibit A**

IN THE MATTER OF THE ARBITRATION BETWEEN

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LEGION INDEMNITY COMPANY  
(IN LIQUIDATION)

Petitioner,

-and-

CATALINA HOLDINGS LIMITED

Respondent.  
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: Jeremy R. Wallis, Umpire  
: James Leatzow, Arbitrator  
: Jonathan Rosen, Arbitrator  
:  
:  
:

**INITIAL FINAL AWARD**

WHEREAS, Respondent is successor in interest to Alea Group Limited (formerly known as Rhine Re Limited of Basel, Switzerland), who was a reinsurer on Treaties referenced below as 121002/128702, 136402, and 141101 and who was acquired by Respondent in 2013. Alea Holdings UK participated in the Treaties 121003/128703 and 121303/121403 and was acquired by Respondent in 2009.

Petitioner's Pre-Hearing Brief referred to the following as "the Treaties" variously in dispute in this arbitration:

Contractors Wrap-Up/Projects and Discontinued Completed Operations Casualty Quota Share Reinsurance Agreement, effective January 1, 2000 through January 1, 2001 (ref. 121002/128702). Catalina assumed share – 7.5%

Contractors Wrap-Up/Projects and Discontinued Completed Operations Casualty Quota Share Reinsurance Agreement, effective January 1, 2001 through January 1, 2002 (ref. 121003/128703). Catalina assumed share – 15.0%

General Contractors and Sub-Contractors Casualty Quota Share Reinsurance Agreement, effective January 1, 2001 through January 1, 2002 (ref. 121303/121403). Catalina assumed share – 15%

Contractors Excess Wrap-Up Quota Share Reinsurance Agreement, effective January 1, 2000 through January 1, 2001 (ref: 136402). Catalina assumed share - 7.5%



Mobile Crane Rental Program Excess of Loss Reinsurance Agreement, effective March 1, 2000 through February 28, 2001 (ref: 141101). Catalina assumed share – 10%

WHEREAS, Aon Re Inc. was the broker of record for all but the Mobile Crane Rental treaty (ref: 141101) which was placed by Guy Carpenter & Company, Inc.

WHEREAS, Petitioner was placed into receivership by Illinois court order dated April 9, 2003 and is administered by the Illinois Director of Insurance through the Office of the Special Deputy Receiver (“OSD”).

WHEREAS, during an organization meeting in this matter held in Chicago on July 27, 2017, the arbitration panel identified above (“the Panel”) was duly constituted and accepted by Legion and Catalina;

WHEREAS, the parties agreed that their dispute should be resolved at a hearing with each party presenting witness testimony and oral argument;

WHEREAS, following the submission of pre-hearing briefs by counsel for each party the arbitration hearing was conducted in this matter at the law offices of Thompson Coburn LLP in Chicago, Illinois on June 12, 13 and 14, 2018.

NOW THEREFORE, having reviewed and considered all of the evidence submitted by the Parties, including exhibits and deposition transcripts, as well as the evidence and arguments proffered at the hearing, including fact witness testimony, and having had the opportunity to fully deliberate the issues presented and having considered all the evidence, the Panel hereby rules and directs as follows:

**REDACTED**

**REDACTED**

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**REDACTED**

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7. With the issuance of this Initial Final Award, the parties are entitled to resume *ex parte* communications with their respective party arbitrators.

Dated: June 21, 2018

By The Members of the Panel:

Umpire, Jeremy R. Wallis: \_\_\_\_\_

Arbitrator, James Leatzow: \_\_\_\_\_

Arbitrator, Jonathan Rosen: \_\_\_\_\_

## **Exhibit B**

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In the Matter of the Arbitration Between

LEGION INDEMNITY COMPANY  
(In Liquidation)

Petitioner,

- and -

CATALINA HOLDINGS LIMITED

Respondent.

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Before:

Jeremy Wallis (Umpire)

James Leatzow (Arbitrator)

Jonathan Rosen (Arbitrator)

**FINAL AWARD**

1. The Panel issued its Initial Final Award on June 21, 2018, which it hereby reaffirms and incorporates herein.
2. Counsel for Respondent has alerted the Panel to the fact that recitation of one contract that formed part of this proceeding was inadvertently omitted from the Initial Final Award, which the Panel now clarifies by the inclusion of the following to the listing on pages one and two and comprising "the Treaties" variously in dispute in this arbitration:

Casualty Quota Share Reinsurance Agreement (A.C.T. Preferred Residential, U.S. Risk Underwriters) effective July 1, 2000 through July 1, 2001 (ref. 153901). Catalina assumed share – 17.5%

**REDACTED**





**REDACTED**


5. All further requests for relief are DENIED.
6. With the issuance of this Final Award the parties are entitled to resume *ex parte* communications with their respective party arbitrators.
7. The Panel shall remain constituted and shall dissolve once notified that the provisions of this Final Award have been satisfied.

Members of the Panel:

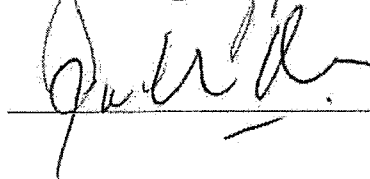
Umpire, Jeremy Wallis:



Arbitrator, James Leatzow:

 (dissenting on the award)

Arbitrator, Jonathan Rosen:



Dated: July 31, 2018